

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Alex Spiro (appearance *pro hac vice*)
alexspiro@quinnemanuel.com
51 Madison Ave., 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Daniel C. Posner (CA Bar No. 232009)
danposner@quinnemanuel.com
Mari F. Henderson (CA Bar No. 307693)
marihenderson@quinnemanuel.com
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Asher Griffin (appearance *pro hac vice*)
ashergriffin@quinnemanuel.com
300 W. 6th St., Suite 2010
Austin, TX 78701
Telephone: (737) 667-6100

Attorneys for Defendant Tesla, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

OWEN DIAZ,
Plaintiff,
v.
TESLA, INC. d/b/a TESLA MOTORS, INC.,
Defendant.

Case No. 3:17-cv-06748-WHO

**DEFENDANT'S PROPOSED
IMPEACHMENT DESIGNATIONS OF
DEMETRIC DI-AZ'S DEPOSITION
TESTIMONY**

Judge: Hon. William H. Orrick

1 Defendant Tesla, Inc. respectfully submits the following chart identifying impeachment
 2 deposition testimony designated for the above referenced witness:

Page:Line	Deposition Excerpt	Party
31:20-32:9	<p>31:20 Q. How would you describe your relationship with 31:21 your father?</p> <p>31:22 A. My relationship with my father was good.</p> <p>31:23 Q. How often do you speak to your father on 31:24 average?</p> <p>31:25 A. Probably every day. One time a day at least.</p> <p>32:1 Q. How often do you see your father?</p> <p>32:2 A. He's been working a lot; so I might see him --</p> <p>32:3 his off days are, like, Wednesdays and Thursdays. So I</p> <p>32:4 go by my mom's house and I see them.</p> <p>32:5 Q. So you see him every Wednesday and Thursday?</p> <p>32:6 A. Roughly, unless I have stuff I have to handle</p> <p>32:7 and I can't make it out there.</p> <p>32:8 Q. And where is your father working now?</p> <p>32:9 A. AC Transit.</p>	Def.
103:7-10	<p>103:7 Q. Can you describe what Javier Caballero looks 103:8 like?</p> <p>103:9 A. He's a Mexican male. That's pretty much all I</p> <p>103:10 remember. I don't remember, like, full details.</p>	Def

14 DATED: March 30, 2023

15 By: */s/ Daniel C. Posner*

16 Daniel C. Posner

17 Mari Henderson

18 QUINN EMANUEL URQUHART & SULLIVAN, LLP

19 865 S. Figueroa St., 10th Floor

20 Los Angeles, California 90017

21 Telephone: (213) 443-3000

22 Facsimile: (213) 443-3100

23 Alex Spiro (appearance *pro hac vice*)

24 alexspiro@quinnemanuel.com

25 51 Madison Ave., 22nd Floor

26 New York, NY 10010

27 Telephone: (212) 849-7000

28 Asher Griffin (appearance *pro hac vice*)

29 ashergriffin@quinnemanuel.com

30 300 W. 6th St., Suite 2010

31 Austin, TX 78701

32 Telephone: (737) 667-6100

33 Attorneys for Defendant Tesla, Inc.